



**THE CITY OF NEW YORK
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June 22, 2020

BY ECF

The Honorable Roanne L. Mann
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Lucas v. City of New York, et al.,
19 CV 3494 (FB)(RLM)

Your Honor:

I am an attorney in the Special Federal Litigation Division of the New York City Law Department, representing defendants the City of New York, Stephen Lalchan, Adam Georg, Jason Fritz, Robert Bracero, Thomas Reo, Daniel Sjoberg, Keith Shine, and Kevin Catalina (collectively, “Defendants”) in the above-referenced matter. Defendants write to respectfully request a forty-five (45) day enlargement of time to comply with the Court’s order dated March 30, 2020, directing Defendants to complete production of certain files by June 24, 2020. *See* Order dated March 30, 2020. Plaintiff’s counsel consents to this request. If Your Honor is inclined to grant this request, it will not interfere in any way with the parties’ ability to meaningfully participate in the settlement conference with the Court scheduled for July 14, 2020, at 10 a.m.

By June 24, 2020, Defendants will have produced to Plaintiff approximately 775,000 pages. Notwithstanding these efforts, approximately 15,000 pages of documents remain to be reviewed and produced. The remaining documents consist, in large part, of documents created by the District Attorney’s office. In light of the fact that Plaintiff was arrested with sixteen other individuals, Defendants are mindful of the need to carefully review these documents to protect the non-parties’ N.Y.C.P.L. 160.50 interests, as well as their private and sensitive information.

Defendants do not believe that any delay with the production of the outstanding

documents, *less than two percent* of the entire universe of documents from the files of the District Attorney's Office pertaining to Trevor Lucas, will impact the parties' ability to have productive settlement discussions on July 14, 2020. Plaintiff's counsel consents to this proposal. Accordingly, Defendants respectfully request that the Court extend the time for Defendants to produce the remaining documents from the District Attorney's Office files, from June 24, 2020, to and including August 10, 2020.

Defendants thank the Court for its consideration.

Respectfully submitted,

Joanne M. McLaren /s/

Joanne M. McLaren

cc: Gabe Harvis, Esq. (by ECF)
Baree Fett, Esq. (by ECF)